

# Policy Compliance Dashboard

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# Summary of the problem (I)

- The AFRINIC RSA mandates members to comply with the AFRINIC policies developed via the PDP.
- Section 4.c of the RSA states the irrevocable commitment of the member for using the services for the purpose for which it was requested and in full unreserved compliance with AFRINIC policies.
- This is of key importance, because a member not following the policies may be impacted in the evaluation of future requests by AFRINIC, the revocation of the services or even the closure of the member (section 4.b.iii).
- Just to be clear, “services” are defined in the RSA, under section 1.c, and those include number resources, among others. So, the impact for a member that is not following the PDP process and CPM changes, may be of catastrophic business consequences.

# Summary of the problem (II)

- The PDP is continuously updating the CPM, and it is obvious that some members may not be following, up to date, all the details and possible impact in their services/resources, while the RSA states that AFRINIC, at its own discretion, can investigate the use of the services.
- Consequently, members should be protected against this situation, in a simple manner that allows them to know their up to date policy compliance, get alerts about the lack of compliance and consequently react to address those.
- At the same time, the RSA doesn't state a specific procedure to resolve the situation with members, and facilitate them the actual compliance, neither if they should get a specific time or opportunities to resolve the situation, in a fair way to all the members, instead of taking irreversible decisions at the first occasion of any policy violation.
- There should be always equal opportunities for any member to correct mistakes before reaching a fatal point

# Addressing the problem

- This proposal provides the framework for a “Policy Compliance Dashboard”, to be developed by AFRINIC, and incorporated to MyAFRINIC (and future members communications platforms).
- This will allow periodically review of the policy compliance status of each member, as much automated as possible, so they can receive automated notifications of any issue. Warnings will be also sent to the staff, and only in cases of a continued and repeated lack of compliance, or severe violation of certain aspects of the CPM, AFRINIC will be able to take further actions according to the RSA.
- Considering the exhaustion of IPv4, recovered/returned IPv4 resources are placed at the end of the actual pool. However, other resources are quarantined for a period of 2 years. This way, the staff can take measures to ensure that all the resources are as clean as possible, before being allocated/assigned again.

# Proposed Text (1)

## 1 Policy Compliance

AFRINIC services are provided to members under the umbrella of the RSA mandate, which in turn ask for compliance with policies.

Those policies are documented in the CPM, which is continuously updated by the PDP.

## 2 Policy Compliance Dashboard

AFRINIC “Policy Compliance Dashboard” shows to each member its status of policy compliance, collected by means of a periodical review, automated as much as possible.

The dashboard will show all possible details to match the CPM and RSA, such as:

Contractual obligations (such as status of payments or documents).

- Lack of response from the member.
- Unused or unannounced resources (where mandatory).
- Unavailable or outdated Whois information.
- Lack of maintenance of the reverse delegation.
- Forbidden sub-assignments (from PI assignments).
- Unauthorized transfers.
- Tracking of repeated and/or continued policy violations.

The dashboard automation will need to be accommodated along CPM evolves thru the PDP, in order to display new details.

# Proposed Text (2)

## **3 Notifications**

The dashboard will automatically send notifications of the status of compliance to members, after each review or dashboard update.

Reminders will be periodically sent in case of any lack of compliance. In this case, warnings will be also sent to the staff.

## **4 Lack of Compliance**

AFRINIC will be able to initiate a more exhaustive investigation and take further actions, according to the RSA, when there is evidence suggesting that there is a lack of compliance.

It will not be considered lack of compliance when the policy violation has been caused by a third party, without the knowledge of the member, and if it is evident that there is no collusion or negligence on its part.

# Proposed Text (3)

## 5 Service Withholding, Revocation or Member Closure

Unauthorized transfers, lack of payment or document fraud, once confirmed, will be cause of the revocation of the services and member closure.

Repeated and/or continued policy violations once confirmed, may be cause of service withholding and resource revocation. Towards that, AFRINIC will take the following steps:

- a) AFRINIC will attempt to contact the member and rectify the situation.
- b) If the situation can't be regularized, AFRINIC will publish the resources that are to be recovered for a maximum of three months.
- c) During this period, the organization may still regularize the situation.
- d) In all other cases, two months after the resources are published, AFRINIC will proceed to delete the NS records pointing to the authoritative nameservers of the resources involved. This information may be recovered once the organization reestablishes contact with AFRINIC.
- e) If three months after the resources are published the organization has not regularized the situation, the resources will be recovered and the records of the holders of these resources will be removed from AFRINIC's database.
- f) All other provisions specified in the RSA and Bylaws will apply.

# Proposed Text (4)

## **6 Exceptionalities**

When the revocation of resources involves essential strategic infrastructure that is necessary for the operation of the Internet in the region, or in exceptional situations such as natural disasters or political instability, the AFRINIC Board may extend the resource revocation period, with prior assessment by the Staff, once such an exceptional situation is detected.

## **7 Resource Return**

Resource recipients may return the resources to AFRINIC, in full or in part, at any time.

If all the resources are returned, all the other provisions specified in the RSA and Bylaws will apply.

## **8 Resource Publication**

AFRINIC will publicly list the resources that have been recovered or returned, so that routing filters can be adjusted.

## **9 Use of Recovered or Returned Resources**

IPv4 resources will be incorporated at the “end” of the pool in force at the time of the recovery or return, for use in the order in which they have been added to that pool.

The IPv6 and ASN resources will be incorporated into their respective pools, after 2 years of their recovery or return.

However, AFRINIC may use these resources differently, in application of best practices, to optimize compliance with the provisions of section 2 of RFC7020. For example, if 16-bit ASNs are recovered or returned.



# References

## AFRINIC RSA:

- <https://afrinic.net/membership/agreements>
- <https://afrinic.net/ast/pdf/services/afrinic-rsa-en-201801.pdf>

Similar policies or procedures, for the same/similar purposes, also exist in the other regions.

- APNIC:

<https://www.apnic.net/community/policy/resources#4.2.-Closure-and-recovery>

- ARIN:

<https://www.arin.net/participate/policy/nrpm/#12-resource-review>

- LACNIC: An equivalent proposal reached consensus (pending implementation):

<https://politicac.lacnic.net/politicac/detail/id/LAC-2019-9?language=en>

- RIPE NCC:

<https://www.ripe.net/publications/docs/ripe-694>

<https://www.ripe.net/publications/docs/ripe-716>

# Responses to Impact Analysis (1)

## 1. Staff Interpretation & Understanding of the proposal

- “Any new policy proposals that will be proposed shall also indicate clearly any elements of non-compliance that shall then be incorporated in the dashboard.”
  - The proposal don’t say anything about that. Every CPM section already indicates what is correct an what not, so it is obvious what it is a non-compliance. So no need for that.

## 2. AFRINIC Staff Comments & Recommendations

- “C. The scope of the proposal includes both the CPM and RSA violations. It is recommended that the scope be classified into two categories”
  - No need for that. The list in the proposal (“such as”) is only informative, not normative, the classification is left to the operational considerations, such as what categories are already explicit contractual non-compliance in the RSA, or lack of policy compliance (some may fall in both cases and this can even change with the time).

# Responses to Impact Analysis (2)

## 3. AFRINIC Staff Clarification Requests

- “Tracking of repeated and/or continued policy violations. - For consistency, policy authors may propose a threshold that mandates action and also clarify when and how the counters get reset”
  - Every CPM lack of compliance may be different and the chances for errors as well, so we prefer to left this to the staff decision, also because this may change with the time.
- “AFRINIC shall publish resources under breach for a maximum of 3 months, where would the publishing ideally happen.”
  - Same as above, we believe those should be staff operational decisions.
- “The policy proposal mentions a quarantine period of 2 years for ASN/IPv6. The quarantine period is currently 12 months and AFRINIC staff suggests that the quarantine period would best be left as an operational decision rather than have it specifically stated in the policy, as some factors may arise requiring urgent review of such a time frame.”
  - We believe that the quarantine periods of 2 years for non-scarce resources (IPv6 and ASN) are good, while scarce resources (IPv4) should be quarantined only the minimum required time. In any case, we allow to adapt this in the policy text:
    - “However, AFRINIC may use these resources differently, in the application of best practices, to optimize compliance with the provisions of section 2 of RFC7020 ...”

# Responses to Impact Analysis (3)

## 4. Impact on Registry Functions

### 4.5 Impact on staffing/human resources

- Note that this, as any proposal, doesn't necessarily requires a "one shot" implementation. In fact, in this proposal case, it is obvious that the dashboard requires different levels of automation (and degrees of complexity) for each part of the CPM. Some of them are very simple or even already existing, others may require more time. So it is perfectly understandable that implementation on the complete CPM may require more time, without a strict need of "additional resources", if instead they are spread over the time.
- As the staff already indicated that this will require 6 months after MyAFRINIC v2 is implemented, if we can reach consensus now, this leave the community room for improving the policy when the staff presents a first "detailed" development/implementation report.